

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jacob Jeffrey Baron

Case: 2:22-mj-30065

Case No. Assigned To : Unassigned

Assign. Date : 2/11/2022

Description: CMP USA v. BARON
(SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 10, 2021 through January 2022 in the county of St. Clair in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*18 U.S.C. § 2252A(a)(2)
18 U.S.C. § 2252A(a)(5)(B)
18 U.S.C. § 2252A(a)(1)*Offense Description*Receipt of child pornography
Possession of child pornography
Transportation of child pornographyThis criminal complaint is based on these facts:
see attached affidavit.☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: February 11, 2022City and state: Detroit, Michigan*Complainant's signature*David M. Alley, Special Agent (HSI)*Printed name and title**Judge's signature*Hon. Jonathan J.C. Grey, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT

I, David M. Alley, being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS). I am assigned to the Special Agent in Charge (SAC), Office of Investigations (OI) in Detroit, Michigan with offices located at 477 Michigan Ave., Suite 1850, Detroit, Michigan. I have been employed with HSI since March 2007. I have successfully completed the Criminal Investigator Training Program and the Immigration and Customs Enforcement Special Agent Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have received a Bachelor's Degree in Criminal Justice from Michigan State University, as well as a Master's Degree in Criminal Justice from Michigan State University. I have successfully completed the Basic Computer Evidence Recovery Training (BCERT) at FLETC and the Advanced Computer Evidence Recovery Training at the Cyber Crimes Center (C3) and the Cyber Crime Center Mobile and Cellular Device Data Extraction course and possess an A+ certification.

2. This affidavit is made in support of a criminal complaint and arrest warrant for **Jacob Jeffrey Baron** (DOB XX/XX/1989) for violations of Title 18, United States Code, Sections 2252A(a)(2), 2252A(a)(5)(B), and 2252A(a)(1)

which criminalize, among other things, the receipt, possession and transportation of child pornography and other related materials child pornography and other related materials.

3. This affidavit is based on my personal knowledge, experience and training as well as on information obtained by me through investigative observations and conversations with other HSI agents and agents from other law enforcement agencies. This affidavit does not set forth every fact resulting from this investigation; rather, it contains a summary of the investigation to date for the limited purpose of establishing probable cause to obtain an arrest warrant for **Jacob Jeffrey Baron**.

PROBABLE CAUSE

4. On or about January 10, 2022, Dropbox Inc. sent a report to NCMEC indicating that Dropbox Inc. had identified approximately 13 files containing child pornography that had been uploaded to one of their user's Dropbox accounts. Dropbox, Inc., indicated that each of the files had been reviewed by a Dropbox employee and that they appeared to be child pornography. Dropbox further stated that the entire contents of the uploaded files were publicly available.

5. The NCMEC report also provided the following information regarding the owner of the account:

Email Address: guitarkid****@gmail.com¹ (Verified 12-08-2015 10:37:08 UTC)

Screen/User Name: Bob Butler

ESP User ID: 499476357

IP Address: 2601:409:200:1e60:d9b9:a069:e059:829b (Login) 01-08-2022 16:46:31 UTC]

IP Address: 2601:409:200:1e60:91c5:b7e2:5460:7d5d (Login) 01-10-2022 07:23:51 UTC

6. The above IP addresses were found to resolve to Comcast. On or about January 28, 2022, I sent a summons to Comcast for basic subscriber information for both IP addresses at the times listed above. On February 1, 2022, Comcast responded to the summons indicating that the service for both IP addresses was in the name of Jacob Baron at a residence in the Eastern District of Michigan. On or about January 28, 2022, I served a summons on Google for information, including subscriber and login information for Gmail address guitarkid****@gmail.com. On January 31, 2022, Google responded to this summons indicating that the name associated with that account was Jake Baron.

7. Dropbox Inc. provided each of the 13 files containing child pornography to NCMEC. NCMEC in turn provided the files and NCMEC report to the HSI Detroit, Michigan office. I have reviewed these images and they depict a nude post-pubescent female and a nude pre-pubescent male. In some of these images, they are engaging in sexual acts, to include oral sex.

¹ This is not the full email address as I have removed identifying information for it and placed in the asterisks.

8. On or about January 10, 2022, Dropbox sent a second report to NCMEC, CT115162517, indicating that Dropbox, Inc. had identified approximately 15 files containing child pornography that had been uploaded to one of their user's Dropbox accounts. Dropbox, Inc., indicated that each of the files had been reviewed by a Dropbox employee and that they appeared to be child pornography. Dropbox further stated that the entire contents of the uploaded files were publicly available.

9. The NCMEC report also provided the following information regarding the owner of the account:

Email Address: baron*****@gmail.com

Screen/User Name: Poop Poop

ESP User ID: 4384746000

IP Address: 2601:409:200:1e60:91c5:b7e2:5460:7d5d (Registration)
01-10-2022 08:00:38 UTC

10. I know from my previous summons to Comcast that IP address 2601:409:200:1e60:91c5:b7e2:5460:7d5d is associated with Jacob Baron at an address in the Eastern District of Michigan.

11. Jacob Jeffrey Baron is a registered sex offender, arrested by Homeland Security Investigations in November of 2017 and subsequently indicted for crimes related to the possession, receipt, and distribution of child pornography. Baron pled guilty to possession of child pornography in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and was sentenced to 48 months

incarceration. A search of publicly available records shows that Baron was released on October 7, 2021.

12. A search of the Michigan Sex Offender Registry shows that Jacob Jeffrey Baron (DOB XX/XX/1989) has a primary address in the Eastern District of Michigan, which is the same address that he has Comcast service registered at. The Michigan Sex Offender Registry shows a last registration date of January 12, 2022, and lists Baron as non-compliant due to a “palm print violation.”

13. On January 31, 2022, Baron reported to the probation department to undergo a historical polygraph exam as part of his conditions of supervision. Prior to meeting with the examiner, Baron informed his probation officer that during the period from June 10, 2021, and October 7, 2021, while on home confinement, he found an old cell phone that was operational, and he viewed both child pornography and adult pornography daily. He reported his target age range was material involving females ages 13-16. Baron further admitted that after commencing his term of supervised release, he again viewed both child pornography and adult pornography on his first approved cellular device, prior to the required monitoring software being installed. He then provided the same admissions to the polygraph examiner during the pre-test interview portion of the exam. Baron further stated that he destroyed the original phone sometime in late November and disposed of it in a dumpster located outside of a location where he

attended sex-offender treatment. He informed the polygraph examiner that he destroyed it there because he wanted the evidence as far away from his home as possible.

14. Based on the above information, I applied for and obtained a search warrant for both Baron's residence and for his person. On February 10, 2022, I, along with other law enforcement officers, executed this warrant. Baron was home at the time of the execution of this warrant and consented to an interview. Baron made the following non verbatim, post-*Miranda* statements:

- a. Baron stated that he "relapsed" with pornography, stating that he found an old phone and was able to get internet access via the internet across the street. Baron stated that it started with "adult porn" and that one night he searched for "the underage stuff". Baron provided the name of a website that he used to look at child pornography. Baron estimated the age of the children depicted in the child pornography was between 12 and 16.
- b. Baron admitted to using Gmail address baronjacob***@gmail.com as his email address.
- c. Baron admitted to having saved child pornography on a phone, usually via screenshot but stated that he "didn't save too many cause of how easy it was to get onto the site".
- d. Baron initially stated that he stopped looking at child pornography a month into his probation and that the child pornography was on his previously destroyed cell phone. When confronted, Baron agreed that he had looked at child pornography more recently than that. Baron stated that investigators would not find child pornography on his current

cell phone and that he had smashed his previous cell phone in front of his probation officer and thrown it in the garbage.

- e. When asked about Dropbox, Baron stated he tried signing in and, when asked what he tried signing in to do, stated “oh I did try to upload that one day, didn’t I”. When asked what he tried to upload Baron stated that it was pictures of teens. When asked if it was child pornography, Baron agreed that it was. Baron stated that it was “female solo acts” and “masturbation” and later stated there “may have been boys too”. Baron estimated this involved no more than 20 images.
- f. Baron stated that he would masturbate to child pornography, orgasm, and then “get super guilty” but didn’t remember “really saving it”. When asked, Baron again admitted to taking screenshots of child pornography and uploading those to Dropbox. Baron was only able to recall having one Dropbox account.

15. Following this interview, electronic items, including Baron’s Motorola One 5G ace cell phone, were seized from Baron’s residence. I have conducted a forensic examination of this phone and during a preliminary review of the contents, I observed approximately 191 images that appear to meet the federal definition of child pornography. Some of these images appear to involve a male toddler engaging in a sexual act with an adult female.

CONCLUSION

16. I respectfully submit that there is probable cause to believe that for **Jacob Jeffrey Baron** (DOB XX/XX/1989) for violations of Title 18, United States Code, Sections 2252A(a)(2), 2252A(a)(5)(B), and 2252A(a)(1) which criminalize,

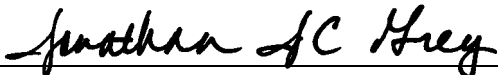
among other things, the receipt, possession, and transportation of child pornography and other related materials child pornography and other related materials. I request that the Court authorize the issuance of a criminal complaint and arrest warrant for **Jacob Jeffrey Baron**.

Respectfully submitted,



David M. Alley, Special Agent
Homeland Security Investigations

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. JONATHAN J.C. GREY
UNITED STATES MAGISTRATE JUDGE

Date: February 11, 2022